

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN SULLIVAN, WHITE OAK FUND LP, CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM, SONTERRA CAPITAL MASTER FUND, LTD., FRONTPOINT PARTNERS TRADING FUND, L.P., AND FRONTPOINT AUSTRALIAN OPPORTUNITIES TRUST on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., BNP PARIBAS S.A., CITIGROUP, INC., CITIBANK N.A., COÖPERATIEVE CENTRAL RAIFFISEN-BOERENLEENBANK B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P. MORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN DOES NOS. 1-50,

Defendants.

No. 13-cv-02811 (PKC)

**DECLARATION OF JOSEPH P. RANDAZZO
IN SUPPORT OF DEUTSCHE BANK AG'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Joseph P. Randazzo, hereby declare:

1. I am Global Head of Global Liquidity Management and an employee of Deutsche Bank Securities Inc., a wholly owned subsidiary of Deutsche Bank Aktiengesellschaft

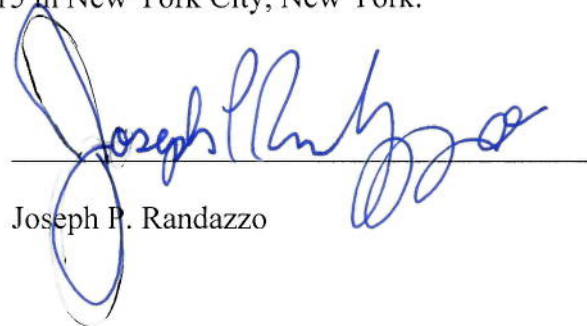
("Deutsche Bank AG"). I submit this declaration in further support of Deutsche Bank AG's motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true based on my own personal knowledge, inquiries within Deutsche Bank AG and my review of records maintained in the regular course of business by Deutsche Bank AG.

2. At all relevant times, Deutsche Bank AG's Euro Interbank Offered Rate ("EURIBOR") submissions were calculated and submitted in Frankfurt, Germany.

3. No employees responsible for Deutsche Bank AG's EURIBOR submissions were located in New York or the United States.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of October 2015 in New York City, New York.



Joseph P. Randazzo